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June 14, 2013

**VIA U.S. MAIL and ELECTRONIC MAIL**

Michael J. Christian, Attorney for San Joaquin County Mosquito and Vector Control District  
Jackson Lewis  
801 K Street, Suite 2300  
Sacramento, California 95814  
ChristiM@jacksonlewis.com

RE: Tiffany Anderson

Dear Mr. Christian,

This letter will serve as a formal request for compensation on behalf of Tiffany Anderson.

**FACTS**

Ms. Anderson was forced out of her job for participating in protected State and Federal activities between 2006 and 2013.

Ms. Anderson was unknowingly exposed to Formalin, a formaldehyde-based compound without her consent and had three documented exposures in which she suffered without ever being told that the chemical was being used.

John Stroh and Eddie Luchessi, Ms. Anderson's supervisors, were fully knowledgeable of the dangers they placed Ms. Anderson in when transferring her to Zone 18. Resources were intentionally pulled from Ms. Anderson with the knowledge of the potential for great danger to Ms. Anderson's health and well-being.

An on the job injury was not reported by John Stroh to the insurance company, and Ms. Anderson was sent back into the work environment by an urgent care doctor, Dr. Eck, provided by the district, where pesticides, dairy water, and unknown organisms entered Ms. Anderson's wound.

Ms. Anderson was retaliated against for filing a sexual harassment complaint against a supervisor that had a history of misconduct, and also for contacting the Whistle Blower hotline

which was wrongly forwarded to the district itself, leading to an extremely hostile work environment.

Ms. Anderson has documentation of claims by other employees against John Stroh and Eddie Luchessi dating back to 1999 which establishes a history of mistreatment against district employees.

Ms. Anderson was denied an opportunity to meet with the board to discuss and resolve her complaints. While Ms. Anderson suffered from a severe internal exposure, the board awarded its members healthcare and did not address Ms. Anderson's complaints. The board also had an opportunity to preserve Ms. Anderson's position of employment. Board members include Mike Manna, Francis Groen, Marc Warmerdam, Jack Fiori, Frank DeBenedetti, Jack Snyder, and Chester Miller.

Despite the medical treatment and follow-up she has participated in, Ms. Anderson continues to have severe pain in her right knee and requires another surgery. All of Ms. Anderson's injuries, pain, losses, and suffering have had a significant impact on Ms. Anderson's life.

### **LIABILITY**

The issue of vicarious liability is clear, under the doctrine of respondeat superior; the employer is liable for acts of their employees, while acting within the scope of employment.

There is no issue of liability in this case and the impact was major. Thus, we view and are confident that a jury would view this case as one in which both liability and causation are clear on the part of the district.

### **DAMAGES**

The events involving the district have had a serious impact on Ms. Anderson. Ms. Anderson has suffered physical injury and pain in addition to severe psychological and emotional damage.

### **CLAIM FOR COMPENSATION**

Ms. Anderson is entitled to full and fair compensation for all adverse consequences related to these incidents.

Considering the respective legal and practical liability risks and the nature and extent of the injuries, Ms. Anderson requests compensation in the amount of \$3,500,000. Ms. Anderson is willing to fully resolve her EEOC claim and any civil claims against the district and all

individual board members in consideration for payment on the aforementioned sum. Additionally, Ms. Anderson would drop the 132-A Workers' Compensation claim.

We believe, and I trust you will agree, that a just settlement is in the best interest of all concerned parties.

Best Regards,

Aliyah S. Abdullah, Esq.